

A NOTE FROM JOHN HARRINGTON

Dear E-rate Stakeholder:

It is often said that we live in "a connected world." Indeed, Internet connectivity continues to transform our daily lives. Yet, those connections do not come cheaply or easily. They require resources and planning. Truth be told, we live in a "need to be connected world" with no guaranteed connections for anyone. It takes consistent work – and a steady financial commitment – to stay online.

There may be no clearer example of this than in schools and libraries. A world full of knowledge is readily available to learners of all ages. There are interactive, personalized learning tools. There are experts waiting to guide. There are opportunities to collaborate with others. And all of this (and so much more) exists online... on the other end of an Internet connection that may not be adequate for the task at hand, or worse, may not even be there at all.

Enter the E-rate program. Since 1998, the federal Universal Service Funding Program for Schools and Libraries, a.k.a. the E-rate, has been supporting those vital connections that bring students and library patrons in to the need-to-be-connected world. And just like the Internet connections that it supports, we should not take the E-rate program for granted. How well is it serving schools and libraries? What is working well? What could be improved?

These, and many other questions, are answered in this report. The information presented is based on publicly available funding data, as well as a nationwide survey of more than 1,000 applicants -- 88% of whom declare that the E-rate program is vital to their Internet connectivity goals.

The opinions, ideas, and outcomes captured on these pages represent the knowledge and experience of schools and libraries across the United States. We owe it to them, and to the communities they serve, to listen to their voices and to learn from them. In doing so, we can continue to support and enhance the E-rate program and its mission of bringing learners of all ages in to a connected world.

Sincerely, John D. Harrington







ABOUT THE F-RATE DISCOUNT PROGRAM

Universal Service Funding for Schools and Libraries, commonly referred to as the E-rate program, provides discounts to eligible entries in the United States towards the purchase of goods and services necessary to connect students and library patrons to the Internet.

ABOUT THE REPORT

The E-rate program supports nearly every school and library in America, annually providing billions of dollars of much needed support for Internet access, telecommunications, and computer networking. Over 21,400 applicants and 4,300 vendors currently participate in the program. For most, their perception of the program is limited to a handful of funding requests and a few personal interactions with USAC customer service representatives.

The purpose of this analysis is to provide stakeholders with a broader picture of the E-rate program. The data and information provided is derived from publicly available funding request data as well as a nationwide survey of applicants conducted in May 2018. All information is current as of June 3, 2018.

This report is not intended to be an encyclopedic review of the program. There are many additional statistics and reports that could be presented. Furthermore, while we strive to be fair and even-handed, this is not a scientific analysis conducted by an independent third-party.

It is our hope that this information will serve as a catalyst for discussion, new ideas, and ultimately, further improvements to this vital program.

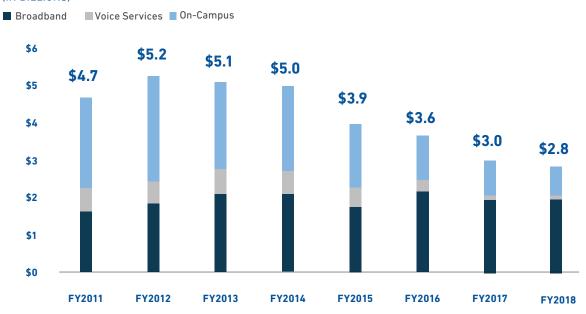
LOOKING AT THE 2018 REQUEST DATA

E-rate funding request data is publicly available and provides unique insight into the communications needs of schools and libraries. The most basic data includes an applicant's name, their service provider(s), E-rate discount rate, and the category of the goods and services being requested (Internet access, telephone service, internal connections, and so on). This data has been available since year one of the program and provides the most consistent source of data for year-to-year comparisons.

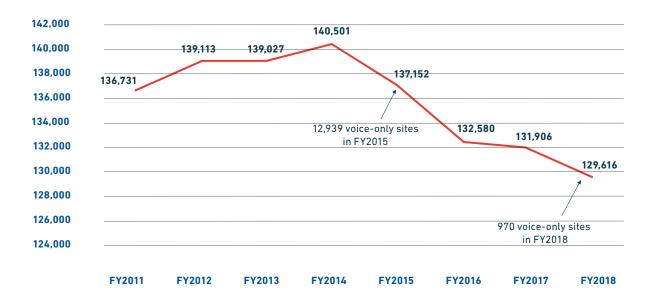
Beginning in 2015, applications have required detailed line item information for each funding request, such as specific line counts, connection speeds, unit quantities, and make and models of equipment. There is variation in how applicants prepare their responses. As more data is collected and as applicants receive consistent guidance, it is expected that the detailed funding request information will become more useful for year-to-year trend analysis.

E-rate Discounts Requested (FY2011-FY2018)

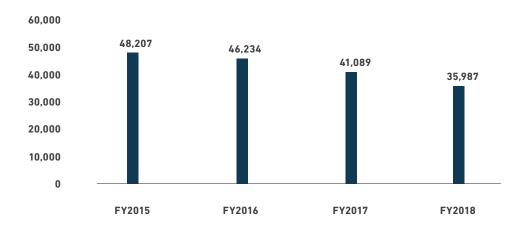
(IN BILLIONS)



Count of Sites Receiving E-rate Discounts

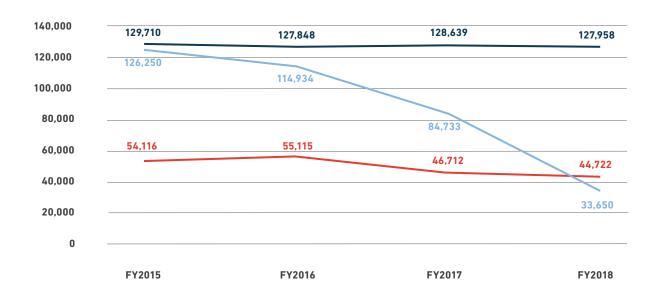


Count of Form 471s Filed by Funding Year

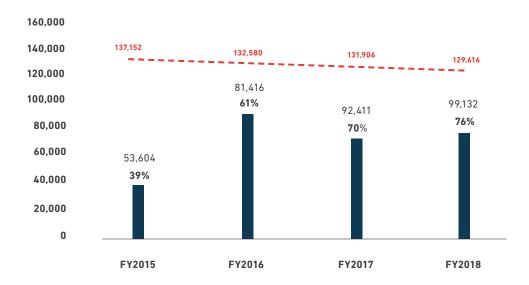


Count of Sites Receiving Service (by Category)



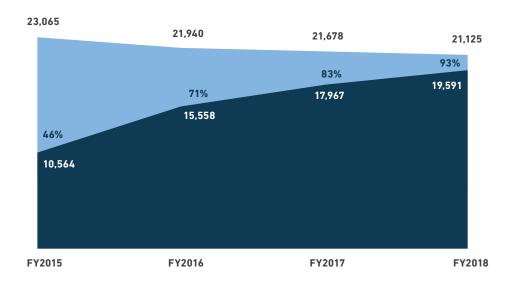


76% of Sites Have Had Category 2 Funds Requested



93% of Applicants Have Used Category 2 Funds

■ Total Applicants ■ Applicants Using Category 2 Funds



THE 2018 APPLICANT SURVEY

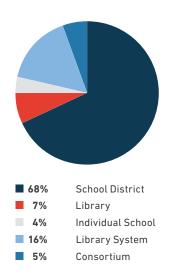
In May of 2018, Funds For Learning conducted its 8th annual E-rate survey, designed to gather feedback and insight from the schools and libraries who participate in the program. The survey is necessary because E-rate funding request data paints an incomplete picture. Not all information is gathered on Form 471 funding applications. For example, applicants may have need of services that currently do not qualify for E-rate discounts. These services are not included on funding applications.

Additionally, there is no basic mechanism for applicants to provide feedback to the FCC about the administration of the program. Applicants can submit Letters of Appeal to the FCC; however, this only captures a certain subset of feedback, mainly negative feedback, related to specific USAC actions or decisions. There is no forum for applicants to express what is working well.

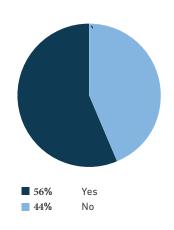
This year's survey received 1,026 applicant responses. This sample size equates to a margin of error of \pm 1-3% with a 95% confidence level. Because the respondents represent a cross-section of applicants that closely matches the overall population of E-rate applicants, we believe that this survey provides a very good indication of what applicants think about the E-rate program today.

SURVEY DEMOGRAPHICS

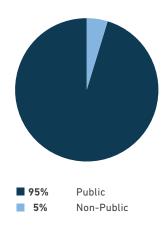
Applicant Type



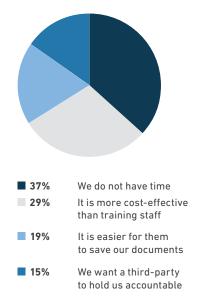
Using Paid E-rate Consultant



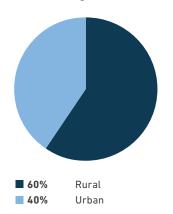
Public or Non-Public Institution



Reasons for Using a Paid E-rate Consultant

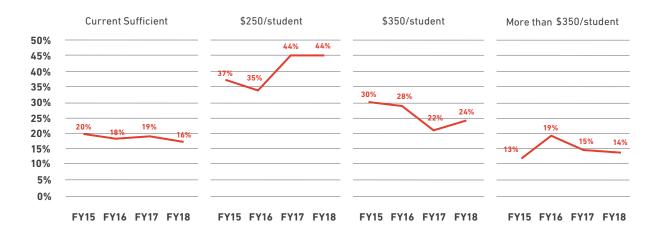


E-rate Assigned Location Designation

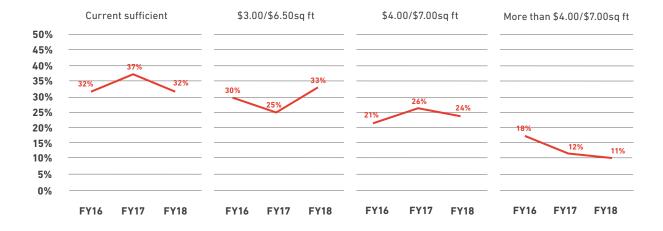




School: How much would you need to fully fund your Category 2 needs?

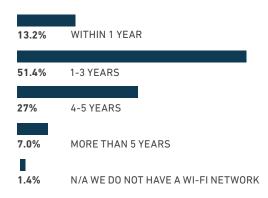


Library: How much would you need to fully fund your Category 2 needs?



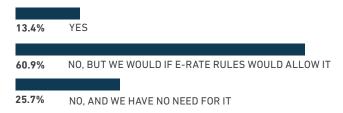
SCHOOL AND LIBRARY NETWORKS

When will you need to upgrade your current Wi-Fi network?

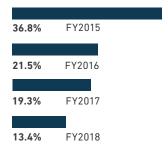


Do you have dual Internet connections (i.e. for load balancing, high availability Internet, etc.)?

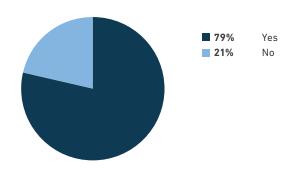
61% OF RESPONDENTS IN 2018 SAID THEY WOULD SEEK DUAL INTERNET CONNECTIONS IF FCC ALLOWED IT



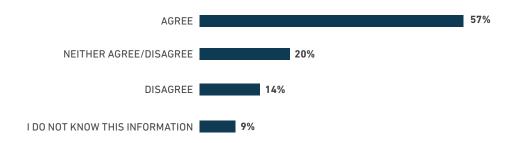
ENFORCEMENT OF "DUPLICATIVE SERVICES" STANDARDS PUSHES HIGH-AVAILABILITY INTERNET USAGE DOWN



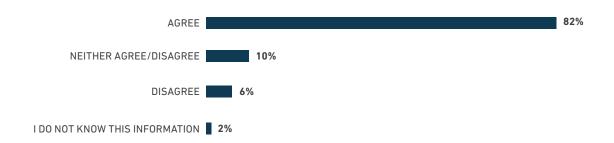
The FCC should permit schools to share Internet access off-campus (if at no cost to E-rate).



We believe our network infrastructure is sufficient to block/withstand an intrusion/security risk.



Insufficient Internet access in the homes of students or library patrons is a significant issue in our community.





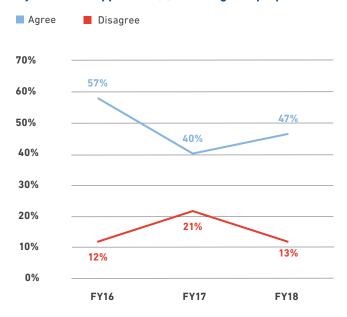
How would you describe using EPC this year compared to the last filing window?



How would you rate the EPC portal in terms of overall ease of use?

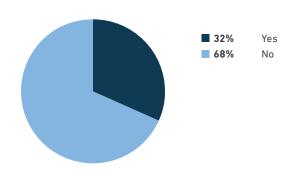


My Form 471 application(s) took longer to prepare and file than in previous years.



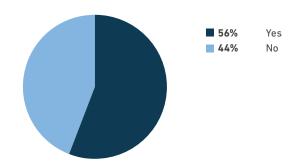
Have you ever experienced reimbursement delays of more than 4 weeks?

ONE-THIRD OF APPLICANTS HAVE HAD SIGNIFICANT DELAYS IN PAYMENTS



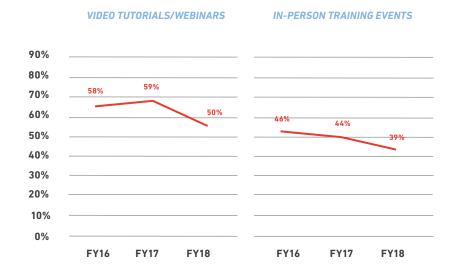
Did you prefer the earlier close of the 2018 filing window?

MAJORITY OF APPLICANTS PREFER EARLIER FORM 471 DEADLINE



Which USAC resources do you find helpful?

USAC WEBSITE	NEWS BRIEF (WEEKLY E-MAIL)	CUSTOMER SERVICE HOTLIN	
81% 80% 74%	81% 80%		
		62%	
		51%	
FY16 FY17 FY18	FY16 FY17 FY18	FY16 FY17 FY18	





SURVEY STATEMENTS

88%	The E-rate program is vital to our organization's Internet connectivity goals.
82%	The E-rate program is ensuring affordable access to high speed broadband.
80%	We have faster Internet connections to our site(s) because of the E-rate program.
78%	We connect more students and/or library patrons the Internet because of the E-rate program.
70%	Our organization can depend on E-rate funding every year.
70%	The E-rate program is maximizing the cost-effectiveness of spending.
51%	The E-rate competitive bidding process lowers our prices.
46%	The E-rate program is making the process fast, simple, and efficient.

APPLICANT SURVEY OPEN-ENDED RESPONSES

E-rate funding request data is publicly available and provides unique insight into the communications needs of schools and libraries. The most basic data includes an applicant's name, their service provider(s), E-rate discount rate, and the category of the goods and services being requested (Internet access, telephone service, internal connections, and so on). This data has been available since year one of the program and provides the most consistent source of data for year-to-year comparisons.

Beginning in 2015, applications have required detailed line item information for each funding request, such as specific line counts, connection speeds, unit quantities, and make and models of equipment. The method of collecting this data varied somewhat between 2015 and 2016, making comparisons difficult or impossible. There is also variation in how applicants prepare their responses. As more data is collected and as applicants receive consistent guidance, it is expected that the detailed funding request information will become more useful for year-to-year trend analysis.

COMMENTS AND SUGGESTIONS ABOUT THE E-RATE PROGRAM, USAC, EPC, ETC.

- Please reinstate the E-rate lifeline program.
- 1) The current C2 budget process takes entirely too much time to determine what we may be able to purchase. Having districtwide budget would be simpler to handle. The PIA process for C2 would probably also be easier. 2) We have 2016 invoices in "Service Certifications" for over six months. and the Invoice Deadline Extensions Requested are expiring. If these Service Certifications are not approved, we will not be able to re-invoice for these much-needed funds. When we contact the reviewer, they just say they are still in review. Is there some way to have a time limit for the amount of time for these reviews? There is over \$200K hanging in the balance and our school needs these funds. Please help with this situation. 3) The 7th Report and Order was to make the E-rate process fast, simple, and efficient - none of this has happened. The number of reviews has become so time consuming and makes applicants not want to go through the hassle to file for this benefit.
- 1) USAC processing of SPIN changes takes much too long. For example, our 2015 SPIN change is still not approved. 2) We never received notice that a PIA or PQA is complete. Email questions simply cease at some point. 3) Coordination of PIA and PQA audits for consortiums are not well managed. For example, last year for PIA we were working with five different reviewers for different FRNs on the same application. They all asked the same questions, but the format of our answers was acceptable to some reviewers and not to others. Also, the reviewers

- were not aware nor understanding that multiple PIAs were being processed by the consortium simultaneously. I strongly recommend that a consortium's application be reviewed by a single reviewer, regardless of the number of associated FRNs.
- 1) Bring back coverage for PHONE services! This is causing a hardship for small rural libraries!!
 2) Simplify and streamline the entire process.
- 5. 1) First of all, thank you to everyone who makes E-rate function. 2) If a school has an untarnished E-rate compliance record, it would be great if they would receive some sort of "express processing" of future E-rate application requests. 3)

 Lastly, I feel that USAC (and vendors) could do more of the behind-the-scenes billing steps, saving school staff many hours and delays. E-rate has improved but remains the most bureaucratic part of my job as IT Coordinator.
- 6. A couple of years ago I had a volunteer that was well versed in the latest computer stuff, and I had her working on the various forms. She got a little bogged down and said, "How much is this application for?" It had told me previously what it was. She looked at me for a minute, then went home and I lost a volunteer. To me the whole program seems to be a combination of 'Publisher's Clearing House' and Form 1040.
- A simple, streamlined application process with one easy-to-navigate site would be helpful.
- All of the E-rate funds should simply be returned to the local school corporations for them to do with as they please with no strings attached.
- 9. Although our library is not new to

- E-Rate, I am a new user. I wish I would have known about training ahead of time. The process is confusing and unclear. I did find some help along the way, but overall it was not easy.
- The application process is getting better and responses are timlier than in the past.
- 11. Applications are rushed through the review process and then further reviewed during invoicing. This sometimes results in denials or reductions in funding; creating cumbersome Form 500 submissions to reapply the C2 budget back to the affected schools.
- 12. As a consultant, our biggest issue is that we know more about the program rules than the Help Desk, making it nearly impossible to get a succinct answer to a complex question about eligibility or process. Quoting the website that didn't provide adequate info and initiated the case, is not an acceptable answer. With fewer annual training offerings and fewer of the old guard in attendance at those trainings, it is getting harder every year to access the handful of seasoned experts who can really help with a tricky problem. We appreciate the difficulty of developing and maintaining program gurus and wish we could offer a solution to accompany this complaint.
- 13. As a library we desperately need to be able to have our public phone. With no funding being allowed we aren't sure how much longer we will be able to keep it. It is used by the librarian daily to make and receive calls and it is also used by patrons on occasion. Just recently it was used to help a patron get her power turned back on. We need to be able

- to keep the phone as a service to our community and library.
- 14. As a rural library, it was very important to us to have telephone service included in E-rate. Because of the cost, we had to drop one phone line completely to stay within our budget.
- 15. As a small rural school, the changes that were made to the C2 funding are causing a huge lack of funds for network upgrades to keep up with the demand of technology used in the classroom.
- 16. As a tech director, I really like all the things that you support. As a taxpayer, I am wondering if I pay for people that cannot afford the Internet. Soon the Internet will be free to everyone. I do not want my tax dollars spent that way. The only way the Internet will expand is to keep it in the free market and keep government out of its way.
- 17. As fast as technology is moving and improving, a five-year equipment cycle is too long. I think networking equipment should be on a three-year cycle. I believe a budget per student district-wide should be established for all schools with a minimum built in so small schools could benefit from the extra money. I also believe the discount matrix needs to be looked at so even the schools with 30%-40% qualifying students could receive an 80% discount. I consider the EPC system is working and is much better than the old system. EPC has saved me a lot of time in the last two years when I was able to file without any problems.
- 18. As I see it, the biggest issues with the program are the following, in no particular order: We can't trust anything we read. The guidance and rules are not consistent from day to day. Every reviewer, customer, service rep or vice president has a different take on the rules with no consistency. Updates or rule changes happen mid-year and are sometimes retroactive. There needs to be a cutoff date for any changes to rules or forms for the current funding year. The per-school budget makes every step of the process 10x more difficult. Procurement, application filing, PIA, service substitution, Form 500, and invoicing

are all much, much, much more difficult because of the per-school Category 2 budgets. I understand why it was implemented in 2015 - to limit requests nationwide - but it has served its purpose. The portal itself has so many bugs; it's hard to list them all. One of the most frustrating and, probably, the most easily fixed is just the inability to sort any table or listing properly. Also, working through service substitutions and Forms 500 in the portal is frustrating because scrolling through the pages of line items isn't consistent. First of all, they only show 5 or 10 items at a time but after clicking on an item, we're thrown back to the top of the list again. And sometimes, we're unable to scroll through different pages of lists. You click on the advance button and the numbers advance but the material in the table is unchanged. It needs more clarity around the approval process for dark and self-provisioned fiber. What are acceptable costs per foot and ROI? If we had some clarity we wouldn't have so much doubt about funding approval. It's ridiculous to not know the rules after 3 years of applications. For the 470 process there should really be a way to avoid posting multiple 470s for the same request. USAC wants us to post a new Form 470 every time there's a change or amendment to the request. This only causes confusion. We might have 4 or 5 470s posted for the same request, depending on whether new information was posted or the scope was changed. There should be a way to maintain the same 470 throughout the process and simply extend the allowable contract date if necessary. And, speaking of the allowable contract date, that field really should be shown on the form when downloaded from their system. It's very odd that the ACD isn't included on that pdf. They need to change the way contracts are handled in the portal. There should be a way to update contract documents rather than having to create a new contract in the portal as signatures are gathered. This just creates multiple entries for the same thing, rather

than providing some sort of version

- control and timeline.
- 19. Being a rural school, we are at a disadvantage when getting reliable Internet service at the higher speeds. This is because of the last mile being local Internet providers. They are able to keep others from being as cost effective and us being able to get other providers into our school. When we do get other bids, they are higher due to having to go through the local providers for the connectivity to our district.
- 20. Better appeal and Form 500 turnaround time. All glitches in EPC need to be addressed more quickly and all previous and current funding years in one place. C2 budgets are extremely confusing when they are not up to date on either the website or the portal. Having to reduce funding requests after the fact is horrible.
- Better communication: 1) when PIA reviews have stalled 2) on status of selective reviews 3) on why invoices remain unpaid
- 22. Better definition of the 5-year budgets: the USAC web-site has one and, on the webinar, it was stated two different ways. District-wide C2 Budget so that the IC can go where they are needed; and bring back Voice services.
- Category 2 budget needs to be addressed to continue support for our school.
- 24. Category 2 budget by district would be so helpful.
- 25. Category 2 budget tool is useless in EPC if it does not include all the budget years. 15 is not included even though it can be part of the current E-rate funding cycle. This causes a huge problem in planning. It seems we should revisit issues multiple times explaining and providing info to multiple reviewers. There is a large span of time in between making it difficult to recall all information - wasting a lot of time. It would be better to move something quickly through all the processes expediently than moving a little over a long span of time. I believe the E-rate program should operate more like taxes. A large amount of both our and USACs time and resources could be saved doing it this way. This would speed things up, give more

- trust, and save time and money for everyone. Then a process to flag problems for review and audits could focus on the problems. I feel like things in the program change while still in process and we are expected to meet new demands before rules were in place. I also feel like we should have more say over how we believe we need to run our networks and prepare them for the future. Things such as amount of fiber strands put in to have for future use because the fiber cost is comparatively cheap compared to the cost of installing it or the need to provide redundancy. The process takes too long, especially for approval for self-provisioned fiber projects.
- 26. Complete processing and funding of 2015 before making future plans!
- 27. Continue Voice services support.
- 28. I could not do without it.
- 29. Currently, the program is bulky and difficult to navigate. Questions are not clearly defined, and it is sometimes difficult to figure out how to answer them. Funding support for annual costs of phone and Internet services is declining but it's difficult to budget for future Category 2 costs at a small rural library.
- 30. Disbursement, after funding approval, should be done within a specified time period. Having no distribution for funding year 2016 is a true burden; especially when there is no reason given for the delay.
- 31. I DROPPED OUT OF E RATE AFTER 19
 YEARS. FORMS GOT TOO HARD AND
 TOO TIME CONSUMING TO FILL OUT.
 REIMBURSEMENT WENT DOWN WAS NOT WORTH THE EFFORT.
- 32. Eliminate the application process and issue schools funding to support technology in schools based on enrollment and low-income status. The savings in administration both at district level and USAC level would see more of a direct benefit to students.
- 33. EPC desperately needs to be redesigned so that there is a hierarchical menu system rather than, for example, having to remember that the Landing Page is under Reports. It should also default to show results for only my own consortium instead of a lot of

- pages showing all applications for all entities.
- EPC has improved the application process somewhat, and the clickpaths and processes are slowly improving, but still need work.
- EPC has made it much easier, less Paper! Funded in Wave 1 this year, very pleased.
- 36. EPC is definitely better than last year, but it still far from an intuitive system for your average applicant. Post-commitments processing such as appeals, SPIN changes, and service subs are taking far too long. The FCC/USAC should allow applicants to file multiple FRNs for technically duplicative services when transitioning from one contract and service provider to a new contract and service provider. This meshes with the real world where there is overlap in coverage for a period of months. Ultimately, applicants true-up with their invoices and BEARs so would never receive funding for duplicative services for the same billing period but it is a stretch to force applicants to try to decide upon one turn update for multiple locations, particularly if the applicant is a large school district or consortium.
- 37. EPC is not adequately searchable. Scrolling through multiple on-screen pages searching for campuses is not user friendly. Post commitment Invoice Audits are taking too long to process, with zero communication back to applicants. If further information is needed, the BEAR is denied instead of reaching out to the applicant.
- 38. EPC is very unforgiving as is at least the PIA reviewer I worked with this year. I still don't know if I need to file an appeal.
- 39. EPC needs better ways to return back to item or page where on previously. PIA accepts approval for Forms 471 and Funding Commits are approved, then SLD review during BEAR submits should approve BEAR. Having issues with USAC on Category 2, basic maintenance and/or software/supports for internal components being denied after prior approvals.
- 40. EPC Portal is still a mess. Example: To go to home/landing page you

- must go to REPORTS. Makes no sense. It is not logically arranged.
- 41. EPC works but the frustrating thing is trying to navigate all the different pieces of it. Some things are so hidden that I must talk to my state's E-rate consulting/support firm to find out where to find it. Also, EPC needs to either not "lock" profile changes during the 471 window or make it much more well-known with a definitive deadline of when changes needs to be made by.
- 42. EPC: It is difficult to utilize the knowledge base. I have never successfully found a solution to a problem nor an answer to a question. The live call center is amazing! Even at the very busiest time (last day to file), the people answering were friendly, professional, and able to assist me in a very short period of time. Network security: As our network expands and more resources shift from on-premise to cloud-based, and the amount of data we handle doubles every couple of years, it is imperative that schools and libraries are able to use some of their E-rate funds to secure their network and nrotect their data
- 43. EPC is a cumbersome and difficult site to navigate. It does not provide for all of the options needed when identifying uses of the program funds. There are times when I have to force entry data into the system just to get the applications completed and knowing that I will have to have it fixed in PIA. Why was the system not put through a trial with a set of volunteer school districts from around the nation? Offer a priority approval queue when you test the program and you'd get plenty of applicant willing to test the new system for you. THEN you can figure out what's needed to correct the system BEFORE you unleash it on your customers.
- 44. E-rate can do some things, but not all things. If beneficiaries wish to go beyond the current eligible services (i.e. redundancy) that is a choice that they can pay for. If everyone has basics needs met, that puts everyone on an even par.
- 45. E-rate Category 2 funding needs to increase to fund the growing

- demands for Wi-Fi access for students.
- 46. E-rate funding has been extremely important to us. It has helped us purchase POE switches for our campus wide Wi-Fi system. The Wi-Fi system has made our state testing with Chromebooks much easier to accomplish. Plus, we are now one-to-one with mobile devices in classrooms, so a robust Wi-Fi system is a necessity to support our instructional goals.
- 47. E-rate funding is vital to our districts. Without E-rate funding we would be unable to continue providing high quality Internet access to our schools.
- 48. E-rate funding is vital to our school district for advancing technology. Without it, our students would remain far behind. I have been administering E-rate since the beginning, but in 2015 I began using a consultant because of the time commitment and program changes. We must have E-rate funds for Internet connectivity. I hope the application process will be simpler and audits less scary in the future. We would like to see eligibility extended to firewall security services and telephone Voice equipment and services. Continuing to fund maintenance services is also important to small to medium rural districts who operate a complex environment without network engineering staff.
- E-rate has allowed us to stay on top of technology advancements. All the improvements and speed help us serve the public.
- 50. E-rate has done a good job helping to provide Internet access to schools. Now we need to get our patrons access at home. Rural communities are struggling.
- 51. E-rate must be proactive in long term planning at the school level, supporting the whole network system not just parts and pieces.

 Switches, servers, security, student access on campus and at home and more. You must do more for the smaller schools and district. The current program puts them at a disadvantage.
- 52. E-rate is a great program and very beneficial to schools, but the

- administrative overhead seems higher than it should be. Simply allocating money based on a formula would net in more positive gains to educational agencies whereas now the burden of applying, reviews, audits/etc....takes away from the net impact to schools and libraries.
- E-rate is an excellent program which has allowed our school district to make key investments in technology.
- 54. E-rate is critical especially to small rural districts with fewer than 750 students
- 55. E-rate is such a worthwhile program but extremely cumbersome to navigate. Frustration is experienced when you upload contracts, bid, etc. during the 471 process and PIA, selective and invoicing reviews. Each one requests the same documentation. After 3 extremely intensive and exhausting Category 2 reviews for each of the last 2 years, I am mortified that reviewer information is not shared nor collaborative between divisions. Some want documents uploaded to EPC and some emailed to them directly. EPC bulk uploads and PIA uploads for a large school district further adds to applicant frustration. I am an advocate for the modernization order and my school district has modeled it's intent. Our students have equal access and equity because of this wonderful program. Please fix EPC and collaborate divisions on reviews.
- 56. E-rate is vital to our school system. Without it, our students could not have the success we have seen in using digital resources. We SO much appreciate the availability of Cat 2 funding for all schools. This has enabled us to begin a 1:1 initiative in all our high schools, possibly soon for middle schools and has enabled our elementary schools to use wireless devices for many different applications. This digital transformation is having a definite positive effect on student achievement. Thank you!
- 57. E-rate should still be allowed to fund telephone costs. Need to find government money to extend broadband to the 30% of district that does not have access to ANY type of broadband. We need the federal

- government to spread broadband access in rural areas that neither Verizon nor Comcast are willing to serve.
- 58. E-rate sucks needed dollars through USAC as an insufficient "middleman organization." It has poor processes, poor communications, and seems more intent on justifying the organization's existence than providing needed funds to schools and libraries. I suggest streamlining the funds and simply funnel at least the school funding through Title 1 existing pipelines. Oversight, ability to audit, ability to restrict funds for purposes, and approval processes are already in place. It would be more efficient and cost-effective.
- 59. E-rate support for our schools and libraries is imperative to the support of our students and community. We would encourage USAC and the FCC to reinstate support for Voice services and to re-examine the need for continued support for Category 2 infrastructure.
- E-rate training should be divided for beginners and well-seasoned participants.
- 61. E-rate's paperwork requirements and document retention requirements are a waste of everyone's time. It makes it almost not worth the effort for small districts.
- 62. Every year we seem to be losing services that have been covered by E-rate before. That is a huge concern to us because we are a small rural community. Example telephone service.
- 63. Experiencing over 400 days of no funding, no information about why, and no questions from USAC for over \$32.4 million in applications.
- 64. FCC should continue funding Category 2 network expansion and upgrade projects for another fiveyear cycle beginning with FY2020.
- 65. Fix the 470 connection-type issue with regards to fiber vs other connection types. It is confusing and frankly, makes no sense the way you are doing it.
- 66. For consortia, the EPC error "one or more of your sites may have incomplete or missing information" needs to be more specific.
- 67. Formula funding for Internet access

- is all this program needs. USAC is a waste of tax dollars and is mostly incompetent.
- 68. Full funding of this program is vital to our rural school districts in Minnesota.
- 69. Funding or VoIP and telephone services is very important to our organization and receiving funding for these services would allow us to more effectively meet our community's needs.
- 70. Have EPC send reminders, after FDCL, for processing the next forms in the process. They send a reminder when I'm late, so send one when it comes due instead.
- 71. Having a mobile app, add an inventory management system within EPC, having an IM chat available as well, receive notifications from EPC on the SLD cert invoices, so that we can login and upload docs to submit. Receive notifications that the reimbursements are deposited into account. I really like the applicant onsite trainings - if they can be more than one day so there are extensive sessions for each application, updates, networking tables - if the trainings can be at the beginning of the year and not in the late fall. More trainings in Texas.
- 72. Having servers eligible
- Having the Category 2 budget be given at a district level instead of at the campus level.
- 74. Having to manage E-rate budgets by school has put a huge constraint on District needs and created so much more work for District employees. Please revert to pre-reformation and allow the District to spend eligible funds where needed. Also, small schools need support; just because they have low enrollment does not reduce the cost of needed equipment and access. Thank you.
- 75. I appreciate the long-standing service you have provided.
- I appreciate USAC coming out with 471 funding commitment decisions sooner this year.
- 77. I believe it is essential that the FCC continue funding Category 2 network expansion and upgrade projects for another five-year cycle beginning with FY2020. This will ensure an ongoing path to improved

- access to high speed Internet access necessary for adequate access to high density media. In addition, I support a change to the current prediscount budget model to remove the building level budgets and apply a district budget. We have high mobility and the students should not have a disparate experience from school to school. In addition, many of the resources to which we direct this funding have district-wide consequences.
- 78. I believe that the intent of the E-rate program is to bring technology to people who need it, and to continue moving technology forward. To that end I believe that VoIP funding, onsite or hosted, should still be covered by E-Rate. The POTS lines style of phone systems is outdated and expensive, so while schools are still required to carry a couple lines of POTS service for Alarms and Elevators (also for fail over in case of an Internet outage) the idea of having 10 POTS lines per school is not efficient or moving technology forward. To that end though I don't think we should take funding away from school when they are already struggling to meet the basic requirements of a learning institution. Phones are required, we can't have students without them and the funding assistance for this required service was very helpful, if only it were better utilized rather than removed completely.
- 79. I believe there are too many forms to fill out. Example: a form to tell you we will ask for money, another form saying we are asking for the money now, and another form telling how much money. Can't the forms be condensed somehow?
- 80. I didn't apply for E-rate this year because the time I was putting into filing the forms wasn't worth the savings I was receiving now that the phones are not covered.
- 81. I do not support Wi-Fi or Internet connectivity to homes provided by the school at all. I live in a very rural economically disadvantaged area and most students and faculty have some type of Internet at home.
- I don't know if I'm finally learning to work my way around the FFL site when working on my 470 and 471,

- but it did go smoother this year for me.
- 83. I encourage the FCC to continuing funding Category 2 network expansion and upgrade projects for another five-year cycle beginning with FY2020.
- 84. I felt the changes to the Internet connectivity on the Form 470 was confusing this year. I had to put out Form 470 multiple times to make sure that I selected the correct service types to ensure funding. I received different answers when I was asking questions on this.
- 85. I find the EPC system difficult to use. I have had to go back and forth and start over many times just to file forms. It is very hard to locate where information is stored.
- 86. I like the portal filing forms has gotten easier but sometimes responding to a review was hard to locate on the website.
- 87. I love E-rate program, our school would be lost without it.
- 88. I may not have selected the highest answer to each question but fully believe in the E-rate program and the progress that our communities have made with the program. I feel there is room for growth and improvements but am very happy that we have the program and so much support for it. Thanks to everyone for your hard work!
- 89. I really get frustrated that schools are treated more favorably than libraries in E-rate funding.
- 90. I said that reimbursement has been slow, but in fact our real problem is getting our vendor, Verizon, to discount our bills in a regular fashion. They are extremely dilatory in doing this year after year after year.
- 91. I stopped applying for E-rate because I could not get either discounted bills or reimbursement from our Internet providers. The application is too complicated and not worth the time taken to complete it and follow up on the payments.
- 92. I strongly support the district level funding vs. funding via building population. I also believe that current advertised prices via web vendors like Amazon, CDW, SHI and others should be available for cost comparison and ultimately purchase

- if the lowest price.
- 93. I think the EPC portal is an absolute disaster. Prior to the portal, I could easily, in a manageable amount of time, complete the necessary forms and submit the to USAC. I have wasted incredible amounts of time and effort trying to file and for the last two years have had to have my state library consultant assist me; which never happened before EPC. I have been in my library for 19 years - director for 9 - have a MLIS and am left feeling like an idiot every time I try to navigate the portal. I do not have the budget to hire someone to provide filing services for me. PLEASE, simplify the portal and the process. It wasn't broke before you fixed it!
- 94. I understand all the workable applications have to be completed by September due to the FCC deadline but there should be special circumstances; additional time should be provided to the applicant. For example, when the services are migrating from one provider to another. The attitude right now at Solix is that "We do not care; we need to finish the applications. You can submit and handle via appeal or post commitment." This type of attitude from Solix is not acceptable. It's more time consuming for school districts or libraries to write an appeal and ask for decision to be changed. USAC should allow reasonable time so that applicants can provide accurate cut over dates to USAC. Also, in EPC you can't talk to anyone. The PIA reviewer most of the time won't answer the phone or return phone calls. This program is to help applicants succeed and to make them fail in reaching their goals which is to provide higher bandwidth to the children. A lot must change with USAC and I don't think we are anywhere close to achieving that goal. For example, EPC, attitude, trainings, the E-rate process and etc. VERY IMPORTANT: Salix PIA reviewers need better trainings so that they can have basic understanding of E-rate program and procedure.
- 95. I wish the application process wasn't so complicated. We have had to hire a consultant for all of the paperwork

- filing because our small, rural library does not have the manpower to keep up with the paperwork.
- 96. I would answer some of the questions in this survey as "depends on the circumstances". In other words, some of the questions cannot be answered with a "yes" or "no".
- 97. I would like to request the reinstatement of full funding of eligible Voice services. Our library requires Voice services on a daily basis for the safety and service to staff and patrons. Living in a low income, rural community, E-rate supports aid in the cost of our Voice and Internet bills. We are then able to use those funds to provide additional services to our patrons. Thank you for your support in this matter.
- 98. I would like to see E-rate go back to allowing school districts to file as a school district instead of each individual school. We have a couple of schools in our district that this change has really hurt. Because they are smaller schools they get very little funding as it is and before the change E-rate made it possible for them to receive much better equipment, now they are getting hand me downs from the schools that get better funding.
- 99. I would like to see schools given a second chance if they make an error in their mathematical figures and not just denied the 471 application.
- 100. I would like to see the C2 budget be a district-wide budget rather than a campus budget. EPC was terrible this year when the system got bogged down the last day of the filing window. I liked the earlier filing window, but it was not a wise decision to move it that far back after last year being the latest it has ever been. That along with all of the program rule changes on how to file forms was a nightmare. If all filing decisions would be final by August or September, that would make this much easier. CSB never gives clear answers and are unsure of the answers they are given. I asked a CSB employee to create a case and was told no... This was because they were wrong in what they told me and I wanted documentation of it. They NEED better training in order to help

- us as the applicant.
- 101. I would like to see the E-rate program streamlined and just giving the funds directly to the schools to spend as they need. You do not allow E-rate to fund many areas that are required to make digital learning a reality in schools. Training, devices, staffing, etc.
- 102. I would love to see content filtering covered by E-rate. It is a requirement for schools, but not funded.
- 103. I would recommend sending confirmation that forms have been received. I always get nervous when the PIA takes forever to review.
- 104. I'd love to see the return of server eligibility for network components like domain controllers and email servers.
- 105. If a district needs to work with other local governments to do a local area network (because we were getting ripped off by Telecom), it is quasi-self-provisioned and it is NOT eligible, and this is a bad thing. There should be no reason local government entities, city, county, and schools who choose to work together, should not be able to get some type of E-rate funding, even if they are already in the contract. Would it be fair to vendors? Maybe not, but the vendors are not fair to some applicants, especially telecommunications vendors. We started down this shared path and it is great for our community but bad for vendors (who happened to be charging us two arms and two legs for the same service, those telecommunication giants were sticking it to us). There is no population area in some rural states that could be considered urban. Please have your people drive to these rural states and then you will see what we mean. Goods and services cost more way out here because of how far it is to travel for them to get here. We get charged by the telecommunications giants WAY more than urban areas. Just saving that a population of 40,000 people is urban is NOT fair. When you have to travel 600 miles to get to that population everything costs more so we should be getting a bigger discount. This is totally unfair and if E-rate is to be a 'fair' to vendor

- system, make it fair to applicants, not just vendors. Please have someone drive from Minneapolis to Seattle and notice how far those 'urban' areas between there are from urban areas. This is unfair. We did not follow through on one of our applications that we were funded for because of the BEAR process; this should be discontinued. The reimbursement to vendors should be speedy enough they are OK taking the discount upon ordering. Something that should be allowed is for emergency communication for schools to be E-rate eligible and more security products. We have such bad cell coverage that we are we having to look into boosters out of our budgets, which is a huge expense. Why do the telecommunications giants get away with this? Why aren't they using the money we and the E-rate program have paid them to increase coverage?
- 106. If USAC would clarify in writing how they will be classifying things like warranties, support, licenses, etc. ahead of 470 filing and that didn't change year to year, we would avoid so many time-consuming issues in PIA. The 470 process is unnecessarily rigid and not at all helpful to receiving better priced bids and keeping schools on the hook for 10 years to repay funds if every single document wasn't retained with staff turnover is cruel and unhelpful. What district has the budget to pay back a project from 7 years ago because of a clerical error or staff turnover losing documents?! I really wish there was consistency and written guidelines that all reviewers interpret the same way. It is chaos every PIA season and I understand why more and more districts are deciding not to bother with the program so as not to open their district up to liability in the future. So disappointing as so many schools have so much need and this program could be run MUCH more efficiently. Also, the help desk people seem to have received zero training and I often have to explain basic parts of the program to them, complete waste of time and resources. Overall an incredibly

- frustrating program to work with that seems to revel in ambiguity and strict adherence to vaguely defined jargon at the expensive of school districts and the students they serve.
- 107. In EPC allow read-only view of PIA questions.
- 108. In my last 6 years of being a library director, I have found that the ease of use of the E-rate and EPC Portal has increased each time I've used it. Keep up the good work! Thanks for all that you do for our library and our school district.
- 109. In order to address the growing needs of rural school districts and rural areas like ours, community Internet access or Wi-Fi initiatives are going to be a critical component of a district technology plan, enabling students to utilize technology at home, through safe, CIPA-compliant Internet access through the school district. We are the most connected organizations in rural areas, and it falls on us to lead the way in educating our students in a 21st century manner, which cannot be done when they do not have access to adequate Internet service at home. Access that we can, and morally should, provide. Therefore, E-rate regulations should be changed to allow for innovation in this space, allowing school districts to provide Internet connectivity to their students and community.
- helpful. Otherwise, there is a disparity in equipment between school sites and NIFs. Revisit budgets by site. Extremely tough in many instances. Often the cost is so much more than the budget that the upgrades cannot be afforded and, therefore, go undone until EOL devices truly die and then the scramble occurs. Adding back the telecommunications and allowing redundant highavailability connectivity is important especially for testing Windows and how many organizations are moving their applications to the cloud. I think allowing partners to utilize connections after hours is great. Cost of transport in rural communities is still high. Getting the access to kids at home is tough in rural communities.

110. Including NIFs in Cat 2 would be

- 111. Increase the Category 2 eligibility list to include (at a minimum) firewalls and content filters.
- 112. Increasing the cap for Category 2 budgets and moving to a district level model for those funds should be a top priority.
- 113. Internet DDOS Mitigation is a requirement for maintaining reliable high-speed Internet. Firewalls stop attacks from entering the network, but do not stop the Internet connection from being saturated during an attack.
- 114. Issues with the E-rate Program: In EPC, there is no reason to change the password so often. We still have funding requests for FY 2017-18 that have not yet been approved. BEAR forms denied or reduced for no reason.
- 115. It is essential in our community to provide Internet access to the residents of our town.
- 116. The bidding program should be opened up. The current process removes several vendors that could lower the total cost. The process also hurts smaller projects. The lack of bids has had a negative impact on the overall process.
- 117. It is sometimes difficult to determine future needs due to the everchanging technology. I wish they changed E-rate to apply whenever the need arises vs. having a deadline. In almost every case, we submit our plan but then 6 months later things change and we can't. :(
- 118. It is still a confusing process. If you do not know what you are doing, you risk losing access to significant funding.
- 119. It is the only way we can afford to provide reliable Internet to our students.
- 120. It is very difficult to keep up the constant changes in the program and the lack of stability is causing panic in our school district.
- 121. It really hurt our small rural library when you took away the phone service from Category 1.
- 122. It would be a tremendous benefit if E-rate funds could be used for Internet filtering expenses. It is a requirement of the program and very expensive, but ineligible. That seems kind of crazy.
- 123. It would be beneficial to Schools if

- you would again allow telephone service to be a service eligible for discounts.
- 124. It would be extremely helpful if the Category 2 budget could be automatically updated when student data is changed in EPC and when funding is awarded.
- 125. It would be great if we didn't have to bounce back from EPC to the legacy website to do everything that goes along with E-rate. The Category 2 budget tracking is terribly difficult. I would 100% recommend removing the by-building C2 rule and do it by district. For consultants, EPC is not very user friendly. Having over 200 customers, it is cumbersome to modify data and track forms.
- 126. It would be valuable to us if NIFs at non-public school organizations were eligible entities again as they were in the past central education offices
- 127. Item 22 did not allow for an already owned network. Item 27 did not define a time frame.
- 128. Keeps getting better each year but is still confusing. Help is good, but often get two different answers for same question depending on who we ask.
- 129. Large districts benefit from district level funding. Improve the description of services on the Form 470.
- 130. Love the E-rate program. Works well in our school district.
- 131. Make the portal application process easier to understand.
- 132. Make the program easier to use.

 Too many rules to know makes it difficult and we use a third-party to help us fill out application over fears that if we make mistakes we will be punished by USAC.
- 133. Make your website more user friendly. Filter out the extra information that doesn't apply to my site or filings. Stop changing the password so often. That is not necessary! Put a help or reminder as to what number or box is the link you need to use. Fix your portal so that it will accept postings. I had to file five times because the portal would not take my work. One of those times I did the filing with one of your aids walking me through it and when I hit submit, it disappeared

- as the other 4 had done. Even the aid couldn't find the filing. I dislike EPC.
- 134. Many directors have several hats in the school system, please make E-rate easier!!!! Too many acronyms, and doing this process is very time consuming.
- is very unforgiving. One small incorrect word, check box, etc. and all funding is denied. Would like to see applicants allowed to correct all mistakes in order to guarantee funding. Otherwise, the money just sits in the E-rate bank accounts instead of in the hands of schools and libraries who desperately need the funding to meet their organizations goals. I am sure many applicants forgo even applying due to the high risk of being denied.
- 136. More consistent rulings on appeals.
- 137. More training and/or webinars for beginners.
- 138. More training is needed to those in USAC charged with "helping" school and library customers. Delays, unnecessary additional forms, reviews of inconsequential activities and events are taking the focus away from the need to provide more services to students, teachers, and the communities at large.
- 139. My organization is in support of the Category Two budget methodology but would like to see the budget calculation be done district-wide rather than per campus. We hope the FCC adopts another 5-year cycle for Category Two funding. The Fall USAC applicant training needs to be a 2-day training where there is enough time to cover the content and allow Q&A without rushing. Perhaps USAC can allow folks who can't travel to access the training via video/webinar. USAC needs to be more transparent with their guidelines in terms of PIA review so applicants can understand the process better and have a better idea of USAC expectations. We hear from reviewers that they are going by their written guidelines but are not able to share these guidelines with applicants.
- 140. Need funding for a consultant or clerical person to maintain filing for school districts.
- 141. Need more for fiber funding.

- 142. Network management and intrusion tools are expensive yet are necessary for security. We can only afford cheap, hard to configure, open-source versions of these tools.
- 143. No consortium related questions in this survey. Legally authorized consortia remain second class applicants and EPC along with USAC processes and procedures continue to appallingly fail this group. Consortia are generally good at reducing costs and consortia that act as network operators for statewide education networks add value that is unattainable from purely vendor operated networks, e.g. security, troubleshooting, and sensitivity to school and library needs. It's time for the FCC and USAC to stop treating state authorized consortia like second class applicants and provide the streamlined forms, processes, and procedures that are needed.
- 144. Not right that dollars be committed and then during invoice review the dollars be reduced stating that of what was approved some of the dollars were ineligible after the fact. Our budget was based upon the committed dollars and caused major issues to our district when the dollars approved was significantly less.
- 145. On behalf of the school districts that I support (I am a consultant), they would be better served if they had a 5-year budget that would support "their choice" of spending it on Voice services, data services, or Internet services. There are districts that can't spend the 5-year budget for Category 2 services because they upgraded their networks prior to the 2015 funding year, and now will forfeit the funds because they could not allocate them to Voice services. etc. Give the districts a 5-year budget and let them spend it on what they need.
- 146. On Category 2, once approved it is approved. The ability of USAC to change its approval at any time puts districts at extreme risk. We are forgoing funding because of the arbitrary changes in approval. Get EPC so that it works! Make it so that we can easily see remaining budgets! Make it so that reclaiming unspent funds works!

- 147. One question not asked or addressed is that funding levels for Cat 1 services anything extra at end of years should be applied across the board for any other approved Cat 1 services not fully funded. We are losing money year after year by not getting fully funded in past services.
- 148. Ongoing Category 2 funding is a must. The costs of security management equipment and support should be allowed as reimbursable.
- 149. Our 2018 Application experience was by far the smoothest and quickest in my 8 years of working with the program for my school district.

 Unfortunately, some of the expedient process is related to the lack of Voice funding which resulted in fewer applications than in years past.
- 150. Our 471 application, took over a year to get approved with FCDL mainly due to EPC Form 500 glitches. BEAR reimbursements are taking longer when so many are going through PIA. I would like to see reimbursements for C1- cell phone and C1 - local SIP come back. Application process, EPC, Form 500 process all need to be much simpler. A set per student amount for C2 and flexibility to change vendor/ contract throughout the year if a price is better or we found an improved product. In forecasting 18 months ahead by site, exact product and quantity is difficult. We are losing money when a site was not on the list and we purchased AP's or switches. Need more flexibility.
- 151. Our district would not have the connectivity we are able to provide without E-rate funding. I would like to see funding for cell phone service restored. Support for self-provisioned and redundant solutions should be increased. Funding for enhanced security / intrusion detection should be provided.
- 152. Our district would request the FCC to continue and increase the funding Category 2 network expansion and upgrade projects for another five-year cycle beginning with FY2020.
- 153. Our E-rate is filed by a providing company. Because of falling county valuation, if we lose E-rate funding, we would have to restructure our entire budget in order to fund telephone services and Internet

- access.
- 154. Our Library would not be able to provide Internet services to the public without E-rate!!
- 155. Our main complaint is that in the past three funding years we have received only partial funding for FY2016 and nothing after. We have also not received any payments for any of the FY2016 invoices we sent and part of our FY2015 invoices, even though we sent the invoices more than six months ago. USAC will not give us any real status information on the matter.
- 156. Our school district is extremely dependent on the E-rate funding to be able to provide the appropriate Internet service to our students and staff
- 157. Our school is small and rural, and we would not have Internet access at utilizable speeds without E-rate. Our school also utilized the E-rate for phone service and is disappointed that it was discontinued. We qualify for 90% E-rate support and have since the inception of the program.
- 158. PIA asks the same questions year after year that we have answered before and even asks questions about multi-year contracts that have already been answered and funded in previous years. This is a waste of our time and theirs.
- 159. PIA reviews are too extensive.
- 160. PIA reviews continue to take months and months, sometimes more than a year. Voice services should be covered, our district spends thousands of dollars per month for analog/copper service such as PRI's for our PSTN connection. No longer having that covered is a severe economic handicap.
- 161. Please add content filtering to E-rate. This is absolutely necessary when providing Internet access to our students!
- 162. Please allow for a more consistent funding stream for rural schools. The technology costs are more substantial than the funding stream.
- 163. Please bring back E-rate discounts for Voice telephone services including local, long distance and cellular.
- 164. Please bring back funding for telecom goods and services. Phone systems are still extremely

- expensive and even though E-rate removed funding for them, the need to procure, install, upgrade, and maintain them isn't going away any time in the near future.
- 165. Please bring back phone coverage for the E-rate program!
- 166. PLEASE bring back Voice/telephone coverage and drop the requirement for filtering! Most small libraries like ours do not have any IT staff (usually we have one staff member, period) and cannot afford to maintain or work with filtering software, especially when our adult patrons require that it be turned off. The American Library Association is against filtering, and my board has chosen not to pursue it as it's more trouble than it's worth. We don't have the staff time to set it up and maintain it, and it's against most libraries' Freedom to Read/View policies. As it stands now, our small library no longer gets E-rate funding since Voice has been discontinued and we are not able to filter our Internet. Small libraries in rural communities are those MOST in need of funding to maintain fast, reliable Internet connections as so many of our patrons do not have access. especially during the summer when school is not in session.
- 167. Please change to a district budget rather than a school budget.
- 168. Please consider that the FCC continue funding Category 2 network expansion and upgrade projects for another five-year cycle beginning with FY2020.
- 169. Please continue funding Category 2 network expansion and upgrade projects for another five-year cycle beginning with FY2020
- 170. Please continue to become more user friendly in reviews and audits. Staff is doing the best they can with the time that they have. Please reduce PQA, selective audits, etc. Spend more time on front-end training and helping applicants apply correctly. Our goal is to comply with guidelines and rules.
- 171. Please continue to support E-rate for schools
- 172. Please cover landline, VoIP and Cell service again. Rural libraries need this small budgets!!
- 173. Please make application forms

- easier.
- 174. Please make EPC less confusing. It's super confusing to my small rural applicants. PLEASE try to come up with a way that they can do an application for multiple years. Solve confusing fiber build designations faster. It was insane that no one could find a real answer to the fiber question this year. It was AWFUL for our applicants.
- 175. Please make the processes simpler.
- 176. Please restore Voice services funding! Also, please make network monitoring services by managed service providers eligible.
- 177. Please update EPC, it's very difficult to use. Total disaster.
- 178. PLEASE allow for a district-wide budget allocation instead of per schools. All physical school buildings are different, and this impacts networks! There would not be any additional funding required if the allocation was still based per pupil but being able to utilize the funds between schools where one school may be larger, and one may be smaller but still has similar number of students is very necessary at this time. Also, PLEASE consider allowing funding for redundant and/or load balanced Internet connections. We can adequately afford one connection, even if without E-rate funding, but we cannot afford an additional connection and all the supporting infrastructure without the funding for the second connection.
- 179. POTS telephone needs to be reinstated for at least another 4 or 5 years. Many rural areas do not have reliable Internet to depend on VoIP phone services.
- 180. Prioritizing self-provisioned WANs could produce significant mid- and long-term savings. Many providers charge excessive fees for installation and maintenance of leased, dark and lit fiber. These savings could help fund other critical new eligible services such as fault-tolerant self-provisioned WAN infrastructure and dual ISP connections.
- 181. Public schools cannot provide the services we have currently without F-rate.
- 182. Question 25. I was required to

- answer Yes/No to the question of whether I would support change how Cat 2 funding is allocated (by building). I answered "No", but only because I would need to see the proposed changes before I could support/not support them.
- 183. Realizing that the E-rate forms should be filed out correctly in the first place I would like to see the reviewers and USAC personnel help the applicants succeed in allowing corrections during the review and input from the SLD.
- 184. Redesign EPC Portal to be more user-friendly.
- 185. Responding to PIA inquiries within EPC is not completely intuitive and there is no way to add documentation to a response later. It would be nice if you could add a document after an initial response submission.
- 186. Schools need funding for Voice service. Communication between classrooms and offices is vital. How are schools supposed to have secure schools without communication? Schools cannot even call 911 without Voice services. How does the ECC communicate between offices? We are certain you still use Voice services. Also, Priority 2 funding needs to be increased for internal connections. Our schools' internal network connectivity desperately needs upgrading and will ultimately start breaking down and collapsing due to the aging infrastructure between servers and switches to cabling. Schools cannot upgrade their network because they do not have the sufficient funding. How can we increase our internal bandwidth without upgrading? Oklahoma wants our schools to increase our bandwidth to a minimum of 2-3 gig Internet connection. Schools have not been able to meet those standards internally because Schools and Libraries decreased our schools' funding, first with the 2 out of 5 rules and then changing the funding to \$150 a student. Our schools need an increase of funding per student more than \$350 per student and needs the funding at least once every other year (biyearly). Schools in Oklahoma cannot meet their own states requirements because of the cuts made by Schools

- and Libraries without taking a pole or research by a funding team with a voice heard by public schools.
- 187. Selecting the lowest price is not always the best or lowest total cost option!
- 188. Servers funding. Servers are a part of the infrastructure and I feel they should be covered for E-rate funding.
- 189. Sharing Internet access with the community would require a full-time tech squad. Where would the money come from to pay salaries and equipment? Where would the equipment be stored? We run a school not a for-profit business.
- 190. Sharing our Internet means we would have to buy additional equipment to allow access outside of our buildings. If E-rate were to pay for the additional equipment we could probably come to an arrangement with our city to put access in our poor and under-served neighborhoods.
- 191. Shorten the time between 471 submissions and issuing FCDL's.
- 192. Since government entities already have state laws that govern procurement, why do we have to have a separate competitive bidding rule set for E-rate? USAC should just require public government schools and libraries to follow local and state laws and audit against that standard (and eliminate Form 470). If PIA always wants to ask for a quote from the vendor, why not have an attach option for vendor quotes in the 471 to save all the follow up required by PIA reviewers.
- 193. Since we do not have a public library in our community our low-income families have limited access to Internet
- 194. Small schools and districts are not treated fairly due to the per-student limit. The cost of filtering should be included in the eligible services.
- 195. Some of the questions should include "Not Sure" answer box.
- 196. Students need access more than just at school.
- 197. Telco & VoIP must be returned to eligible services, ASAP!!! Rural broadband to homes must be and eligible service.
- 198. Telephone service needs to come back in for especially smaller

- schools
- 199. Telephones are not legacy systems. The first line of communication for our parents to the school is still a telephone. Restoring funding for telephone services should be a priority.
- 200. Thank you for allowing us to have Internet service at our small library.
- 201. Thank you. We are very happy with the Funds For Learning team.
- 202. Thanks for reaching out and seeking our thoughts.
- 203. Thanks! Our mission depends on it!!!
- 204. The application process is virtually impossible for us to have completed on our own. There are so many hidden tricks that would have ruined our entire application. We had to pay an enormous sum (\$4500) to a 3rd party to help us apply for E-rate funding, only to discover that we won't see any savings in C2 at all due to ridiculous restrictions to the program. E-rate funds outdated technology and doesn't fund the needs of today's schools. According to the Child Internet Protections Act and other laws, we are required to have a filter, yet E-rate won't help cover the cost. Latest generation firewalls have filtering built-in, and only a portion is discounted!?! Redundant firewalls are not covered. What kind of organization is going to allow a single point of failure like this? And yes, we need a backup ISP like anyone would. After all the things that E-rate won't help us with, we're learning now we probably won't get a penny due to having to finance the purchase. Unbelievable. What a waste of time and money. Also, why are phones not covered anymore? Can we survive without phones in 2018? No. No, we can't. Another major problem with E-rate is the way you calculate need. Our school is in the San Francisco area, where the cost of living is higher than anywhere else in the world. A person couldn't be homeless in San Francisco and qualify under those income limits, let alone the struggling single parents trying to ensure their children get a quality education and go without. We give a significant amount of financial aid to parents, but they certainly won't qualify for the NSLP. Did you know
- rent alone would be more than those income limits? I'm talking about rent in a small house just renting one of the small rooms in that house. It's not fair. This entire E-rate program needs to be completely overhauled. Just start over again from scratch. The website crashes, locks us out. all while under a deadline. If anyone can fix this it would be the new FCC chairman, Ajit Pai. He seems to have common sense. We need that desperately. Applying for E-rate has taken money away from the school rather than helped us get money we desperately need. Complete opposite of what should happen.
- 205. The bandwidth and cost entries by individual ISP is very time consuming. This needs to be modified to be able to compile different costs and low and high bandwidth per ISP. It has become too detailed and time consuming, these details are more necessary for internal organizational data, this shouldn't be needed for approval.
- 206. The BEAR invoicing process is an abomination; rationale for decisions is cryptic, and more specificity is necessary. All post commitment processes take much too long for decisions - all you hear from USAC is that they are busy and will get to it as soon as they can. . . and that's after 120+ days. USAC requires that applicants reply in a timely manner (15 days + 7-day ext.); however, they do not reciprocate, taking extended periods of time to issue decisions. EPC needs to provide more flexibility in responses to Review inquiries. Not every response fits into their "can." Reviewers don't use the tools already available to them in EPC, e.g.
- 207. The C2 funding per student is not enough for us. We have large buildings that are not densely populated enough to make the \$150/ student work. We go over budget in every location and thankfully have been able to find the necessary funds out of pocket. The PIA process questions for self-provisioned and leased dark fiber networks are extreme and show that USAC doesn't have a great understanding of the fiber market. USAC should do more to help schools understand

- why dark fiber might be the most cost-effective option for schools! C2 budgets should be done at the district level and allow for devices/ equipment to be moved between buildings more easily. The rules today are archaic and can result in equipment being left in place that isn't needed anymore while the district must purchase more equipment in another location. EPC continues to improve quickly which is great. Funding review also seems to be going very quickly in 2018 which is another great improvement. The five-year C2 budgeting works well for us and hopefully the FCC renews this moving forward.
- 208. The competitive bidding process has its advantages and disadvantages, but more than one time we have awarded the low bid to a company that did not provide the items that they bid. It would be great if USAC would allocate X amount of dollars to a District and then allow the district to purchase directly from approved vendor. I see the pitfalls, but a company like CDW-G is already approved for State purchasing. We should be able to buy from the preapproved state contract bid list.
- 209. The current auditing process is slow and frustrating in the lack of communication of progress.
- 210. The current EPC system has to go. It is stupid to have that kind of system in place when handing out so much money. I absolutely hate that system.
- 211. The design restrictions on selfprovisioned networks makes no
 sense and should be adjusted.
 Currently, to design a network using
 E-rate funding a ton of fiber gets
 wasted and increases expense while
 lowering the quality of network that
 could be provisioned. Sure, make
 sure all fibers installed are lit, but
 let us splice them in in a manner that
 makes sense and utilizes all of the
 fiber placed.
- 212. The elimination of traditional telephone services has resulted in an extreme expense to K12 schools. We now are not only paying the full cost for these services, we are also paying the universal service fees imposed on traditional phone services. These services are required to operate our business. I

- am talking about POTS, VoIP, Long Distance etc.
- 213. The entire E-rate process/program is too complicated.
- 214. The entire process needs to be refined so that it happens faster.
- 215. The EPC can be confusing when trying to get to forms, actions, etc.
 There ought to be a simpler way to navigate EPC. The USAC helpline representatives are pleasant and helpful. It is nice to speak to a friendly voice when you have questions and/or need assistance or confirmation of the work you have completed in EPC.
- 216. The EPC is our biggest problem as it is confusing, inefficient, and difficult to use.
- 217. The EPC Portal is a struggle to find where "this" is located and where "that" is located.
- 218. The EPC portal is frustrating primarily because of how much clicking is required. Why do we have to "generate" a notification to view it? What kind of nonsense is that? Just show us the notifications and fix the site navigation so we can find what we are looking for. Much of the time is spent navigating instead of putting in information.
- 219. The EPC site should allow the contracts section to be edited so we can add amendments and modify contract end dates each year rather than uploading a new contract doc every time.
- 220. The EPC system has greatly cut down time spent on the E-rate process. My district depends on E-rate funding for fiber and wireless connections.
- 221. The EPC was somewhat easier and more intuitive to use than it was the first year. It is still difficult to pull data for multiple school districts if you want to compare or see what a consortium can offer.
- 222. The E-rate process from Forms 470 to 486 have improved dramatically. This may be due to overcoming the steep learning curve by trial and error experience and the addition of various training videos on the USAC site. Although the BEAR process is simple, I'd recommend moving BEAR processing to EPC.
- 223. The E-rate program continues to be an important source of shared

- funding for our district technology growth and ongoing needs.
- 224. The E-rate program has been a great boon to the district. The new rules for E-rate have taken some getting used to but I can support the transition as the goals/needs being addressed by the program have changed since its inception.
- 225. The E-rate program has been very important in our ability to provide learning resources for our students. The removal of the telecom portion of the funding has had a significant, negative impact on our ability to provide equitable services to our students. That is a feature we would like to see reinstated in future funding periods.
- 226. The E-rate program has come a long way in the 15+ years I have been working with it. I remember the days when fraud, waste, and abuse ran rampant. Now, thankfully, to more stringent rules and a better understanding of the process due to excellent training, most of that is a thing of the past. The E-rate program has helped our district immeasurably and I am very pleased to have had it around.
- 227. The E-rate program is absolutely 100% necessary for our school district to function. We only have the infrastructure we do because of E-rate. We would have zero chance of funding our necessary networking infrastructure needs without E-rate.
- 228. The E-rate program is absolutely essential to our school's mission of trying to provide social & educational parity to students of color from low socio-economic households.
- 229. The E-rate program is critical to our ability to provide Internet access to our patrons. Thank you for it!

 USAC and EPC do a good job of making a very complex process as straightforward as possible, but I would love it as an overworked and understaffed library director if it were even simpler.
- 230. The E-rate program is critical to the success of our schools.
- The E-rate program is cumbersome, and the timeliness of review was horrendous this year.
- 232. The E-rate program is essential to schools being able to and grow/ sustain their ability to provide digital

learning experiences for students. This was my 20th year doing E-rate applications for schools. Category 1 funding in particular has been vital in that endeavor. For rural schools, taking away telephone discounts has been unfortunate and left them with fewer dollars toward other necessary expenditures. Category 2 funding budgets were a good idea, I think, so that money was available for all schools and provided equity. In regard to the EPC, it can be difficult to navigate at times, but has been improving in ease of use. This year doing E-rate applications was for the most part a smooth experience. Some of that is my experience level with E-Rate. It's a complex process for people new to the program and it's not easy to learn. I will say one frustration is the tendency of reviewers to overthink FRNs that are using contracted services that have been approved in previous years. The verbiage in the review response areas we are required to fill out are often overdone and ridiculous. These seriously need to be simplified and restricted to what the reviewer is asking for. Fortunately, calling the reviewer helped with some of that. For other questions about E-Rate, sometimes the phone support is not very useful because of the inexperience of those providing help. One last frustration is that I submitted a Form 500 to change a Service Date in March and it still is "In Review" here in the middle of May. A small service date error should be able to be corrected over the phone with some written documentation. Instead, the vendor has been waiting now for payment for months. Seriously? Also, I think the appeal process is seriously flawed with its time restrictions. There seems to be no remedy especially for those who are inexperienced. Overall, I'm grateful for the E-rate program and the support it provides to schools. I hope USAC can continue to work to improve the user experience in the application process and simplify

233. The E-rate program is invaluable in allowing us to continue to provide

- our patrons with high-speed Internet service.
- 234. The E-rate program is vital for schools to connect their students to the Internet which becomes more vital to learning every day. Unfortunately, the program itself is difficult to navigate and can feel unreliable due to late funding commitments and the fear of making a mistake on the application. It seems like more and more the in-depth reviews are happening after an applicant has received funding in an attempt to get funding commitments out sooner. This can cause fear on the part of an applicant that a mistake may take their funding away after the money is already spent. Limitations put on the services that are eligible through E-rate, and the lack of clarity on eligibility, puts applicants in a position where they don't apply for products, or do not receive the full funding they should. The process itself can also be ambiguous and cause confusion and fear on the part of the applicant. I have never talked to any district that doesn't feel a huge amount of stress cause by the E-rate process. If the E-rate process could be simplified and shift its focus to guiding applicants to success, rather than scrutinizing applications to find an error after the fact, it would make the program more successful. Some of the things that would help applicants are: E-rate approved Master Contracts (for both Category One and Two) that applicants can purchase off of at their discount rate; removal of the Category 2 budgets (there has been a surplus of funds each years since its implementation.); get rid of the Form 468 and add the CIPA compliance to another form; remove unrealistic expectations on Internet access/traffic (if an applicant is receiving services for their WAN, don't restrict the eligibility of the traffic as long as the primary goal is to bring Internet access to the classroom.); allow support buildings to receive Category 2 funds (they are all providing services to the students.); Remove the idea of the funding window, but instead allow users to apply for services at any
- point for a future point (approvals may move faster if they do not all come in at once.); do not have a yearly ESL but instead make it fluid as technology changes (applicants' eligibility will be based on the list at the time of their application.).
- 235. The expansion of the Category
 2 program over the last several
 years has been absolutely vital in
 addressing the infrastructure needs
 within our school district. Without
 this additional funding, we would
 not have been able to build out a
 network capable of handling modern
 connectivity challenges. Continued
 Category 2 funding is vital to schools
 in order to maintain and upgrade our
 network to meet future connectivity
 needs. Thank you.
- 236. The FCC and USAC should reestablish Voice services for schools and libraries. I understand the C2 budgets were in a pilot study; however, the FCC should continue to make the funds available to applicants as it is being used today but increase the per student budget.
- 237. The FCC continue funding Category 2 network expansion and upgrade projects for another five-year cycle beginning with fy2020.
- 238. The FCC must change the C2 per student calculation for state residential schools to a square foot calculation. These are unique schools with unique needs. The FCC's "one size fits all" formula just does not work for state residential schools.
- 239. The FCC's attempt to simplify the program has not been successful; rather it is now more complicated than ever in the twelve years I have been involved. The implementation of EPC, while a good idea in theory, has contributed significantly to the increase in complexity. It was not ready when it was introduced; is not operationally intuitive; and requires too much experience to use efficiently and effectively. It is hard for me to imagine anyone successfully participating in the program without assistance from a consulting firm.
- 240. The first several questions are required; however, we use a consultant to handle the filing of the forms and in dealing with EPIC

- so that should have been a choice; would like for it to be posted and then allowed to download the file(s) as I am not assured this being confidential.
- 241. The home Internet access for students is vital. Google Classroom has roared across the USA and afterhours collaboration is essential.
- 242. The language on the applications and instructions needs to be made MUCH CLEARER, in simple, plain and straight forward language. It is still VERY confusing.
- 243. The largest gap in services is to the homes of our students. Less than 50% of our student homes have any access to Internet services. This is a critical component that is missing.
- 244. The legacy Form 472 BEAR process needs to be discarded and replaced. It is slow, and you cannot attach documentation that is subsequently requested by the reviewer. Also, invoice reviews can be arbitrary, and the only recourse is an appeal that can take many months.
- 245. The loss of E-rate funding for telephone and fax lines has negatively impacted our budget. We receive requests from patrons to send a fax almost daily, and the recipient (often a govt. entity) will not accept a scanned document sent via email, but only a fax.
- 246. The loss of telephone E-rate funding has severely hurt our district. This is a major cost to us and we would like to see that returned.
- 247. The new Category 2 rules allowed us to utilize this funding for the first time. Previous rules never allowed the funding to reach our level which was troubling as we are a rural district.
- 248. The next five-year cycle of C2 funding support needs to be approved so we can start planning.
- 249. The people reviewing the applications should be more techsavvy in order to eliminate confusion and denials due to their lack of knowledge. Also, things that work for larger cities don't work for rural locations and the guidelines and bidding rules need to take that into consideration. Sometimes we have only 1 option.
- 250. The percentage of eligible funds is too low to take full advantage of all

- of the E-rate funding available for our organization.
- 251. The phase down of phone discounts does place a burden on libraries with smaller budgets.
- 252. The phase down of telecom has been a big issue in our school system. In my opinion, this needs to be reevaluated.
- 253. The phasing out of phone services and web hosting is a significant detriment to schools. There is simply no way to eliminate those two things and they are a drain on budgets that are already stretched thin.
- 254. The portal is very interesting at times. The best time to make sure all my school info is up to date is right when I am asking for money, and for the last two years it is locked during this time? It is also very hard to understand where some details are and how to find them to change them, we need more links to these areas from the places that list them or ask about them, if they need to be updated. Thanks
- 255. The portal remains confusing and, over-all, dreadful. USAC staff, for some reason, are making it very difficult for our IT provider to receive reimbursements directly, as he has for the past two years, rather than our filing the BEAR form. Requests for reimbursement, Cat 2 services, are arbitrarily denied, then (sometimes) reinstated. Very DISCOURAGING! Service from USAC/SLD has gotten more complicated since the portal was instituted, et al.
- 256. The portal seems to be getting easier to navigate, but some of the terminology is confusing.
- 257. The possibility of a documentation review of each reimbursement request is daunting. I find that I am trying to time my reimbursement requests so that they do not coincide with other E-rate activities.
- 258. The problems our school district encounters are not with USAC. It is mainly with AT&T and their billing invoices.
- 259. The process is improving but eligible services misses the mark a number of times. For example, why would mobile Wi-Fi hotspots be funded but only if used in the facility. The point of them being mobile is to be used

- outside the facility.
- 260. The process is not easy at all.
- 261. The process is so complicated that most schools hire a third-party to do the E-rate. We can't count on the money so we just budget assuming the money won't be there and if it comes it's a bonus. So, we literally don't really expand our programs with new money because it's such an uncertainty, especially Category 2) We still don't know if we get a rebate this year and frankly it's gotten so complicated that I'm just assuming we won't. Why can't this be like REAP. Put the money per student into an account every five years and we spend it as needed.
- 262. The process is still a pain to fill out the forms online.
- 263. The process isn't transparent or easy to understand for first time or new filers. Also, as a new filer, I didn't see a better service provided by the same vendor, but they are getting thousands more through federal funding.
- 264. The process still takes too long.
- 265. The program is hard to understand and the consultants we hired are not very proactive and provide poor service. They should be held accountable for the services they offer.
- 266. The removal of E-rate funding for VoIP service really impacted our budget adversely. With so many schools and libraries moving to that technology over POTS in an effort to cut costs, I am befuddled as to why this support was removed when telephone is a huge cost for schools and libraries. I would like to see that funding reinstated.
- 267. The review and appeal process needs to be brought under some type of control. We have one request that was initially denied because the rule changed after the bid was awarded. We filed our appeal a year ago and have heard nothing back on it. No process should take that long to rule on.
- 268. The service substitution review process for Category 2 items needs to be improved. General approval delays can result in bid equipment being no longer available. Simple substitution of like or better equipment without price change

- should not take 60 or more days.
- 269. The USAC folks may know their applications rules, etc. but the basic knowledge they share is not sufficient. Also, it is not easy to get a response to a question.
- 270. The USAC website is not the most user-friendly or intuitive to use. It would be helpful to have an option from the landing page to view all reports filed according to the year for the organization.
- 271. The website we must use is not user friendly at all. It is very frustrating trying to find what we need to get to when applying/reviewing/etc.
- 272. There are so many issues with EPC, and it has definitely not made the E-rate process simple! There are issues with EPC and editing. (EPC automatically adds lines that you cannot edit if you change something on a Fiber App). When PIA modifies an application and you see the option for original view and current view, the current view feature does not work, and we really need documentation of the changes. Unfortunately, there seems to be high turnover with the CSB agents. They don't ever seem to be properly trained as even if general questions they always put you on hold to try and find the answer. Also, they are very hesitant to make the case notes public as to what they advised to do as they are afraid it is wrong and do not want it to come back on them later. A co-worker and I literally had one reviewer flat out say "NO" I will not post the notes so you can see them and we politely asked again and again were told "NO!" Not good customer service, nor does that make you feel confident that the answer given was correct. Schools should not suffer for the lack of training of customer service. We also have issues with changing the rules and the way Forms are filed during the filing window. It causes lots of problems and extra work.
- 273. There are so many issues with EPC, especially if PIA/USAC creates another FRN to replace one you cannot see or make service subs etc.** There are issues of locking up an application and not being able to recover. **There are issues with EPC not allowing corrections on

- fiber applications without starting over (EPC automatically adds lines that you cannot edit). ** When PIA modifies an application, the applicant cannot see a "current/ corrected view" in EPC. **PIA needs to get with the real world and use the right C2 categories and not change the product types; for instance, the stacking cable for a switch is part of a switch and related components, yet PIA makes you change to cabling or the power cord of the switch (related component) PIA makes you change to UPS/Power Backup. The reviewers use a 2012 (prior to modernization) code look up book, which is unacceptable. **Another issue, on a multi-year contract that goes through PIA the first year and passes muster: why must the subsequent years of the same contract go through review? **Most CSB agents are not clued into customer service, not totally their fault, I say it may not be emphasized enough in training and reinforced. I believe that when a case has been existing for more than 15 days it should be escalated; there is NO reason an issue should be live for more than 30 days; I have one that has been live from January and it is almost May.**USAC needs to have a process for procedures, the organization needs to go through the Malcolm Baldridge Quality Process to improve systems and processes or something to that nature.** Most importantly, quit changing how to file multiple times during the Form 470 and Form 471 processes. It is confusing and inefficient to do so for both for the applicant and USAC.
- 274. There should be some leniency when dealing with invoice deadlines. Possible a percentage decrease of funding over the next six months after the deadline to provide opportunities for schools to recovery some monies.
- 275. They need to be faster & more consistent at paying. One payment can be within a week & another payment can be within months.
- 276. This is too hard. Why do you have to attach a bid (for Category 2) before you begin to accept the bid? That doesn't make sense. You should attach a copy of the bid when you

- select the vendor. Jumping all around the website sucks. It isn't intuitive at all. Many times, it wants me to magically know what to click. It doesn't flow. Click high. Click low. Click anywhere. YOU SHOULD SCROLL DOWN YOUR SCREEN AS YOU PROGRESS.
- 277. This past funding window I made several calls into the customer service at USAC. I had specific questions about filing for services and filling out forms, etc. My experience was disappointing because USAC did not provide clear answers to my questions. It left me feeling that I was still questioning what response to put on the application. It would be nice if USAC could give definitive answers about simple application/service type issues.
- 278. This program has become entirely tooooo complicated. We must hire a firm to provide E-rate application and services.
- 279. This program has been beneficial to our schools!
- 280. This was first year doing C2 with E-rate. The process overall went very smooth and the receiving of notification of funding came much quicker.
- 281. This whole process is still very confusing.
- 282. This year reimbursements have been more difficult to obtain in a timely fashion. More paperwork is being generated by those "reviewing" the Form 472 process than should be necessary. Reviewers should be reviewing the appropriateness of the BEAR Form in conjunction with approved funding. We have been asked to provide more information not already included on the Form 471 and this also adds to the burden of keeping track of funding.
- 283. This year the application took less time because we had no C2 application due to being at max funding not because it was any easier.
- 284. This year the FCDL was prior to July 1. That's very helpful to applicants.
- 285. This year's process was the fastest, easiest, and required less back-andforth than ever before. Thank you!!
- 286. Too much allocation to dark fiber is allowed, we need more in Category

- 2.
- 287. To survive in current world, college life will require 24-hour connectivity to utilize the purpose of technology.
- 288. Too much time is required for review and documentation of small purchases. EPC features should not be rolled out until fully functional. e.g. it is insane to require direct deposit and then send disbursement notifications by mail.
- 289. Two of the branches in our library system only have one option for Internet access. The competitive bidding process is cumbersome for these locations and should not be required (based on certain criteria).
- 290. USAC is abysmally slow in reviewing applications and appeals. FCC is abysmally slow in reviewing appeals. Customer service hotlines are not answered. Customer complaints are not answered or acknowledged. EPC portal is clunky and difficult to navigate. Forms such as 470, 471, 486 are difficult to interact with in a timely fashion. Window announcements are difficult to follow. Responses back such as FCDL in electronic form are difficult to interpret. Bidding window is narrow and does not fit with the fiscal year. This agency is the epitome of an inefficient, incompetent bureaucracy.
- 291. USAC MUST change to an applicant level funding model for C2. The current model does not give school districts enough money to serve older school buildings and schools with smaller enrollments, while at the same time, gives too much money to newer schools with better structural design and more students. This forces districts to, either waste money refreshing equipment or buying equipment they don't need, or leaving money on the table. While leaving money you don't need on the table is the morally right thing to do, it is not often the most politically easy thing to do. The FCC/USAC then says we obviously didn't need it or we would have spent it, and school boards and administrations say, why did you leave that money? Give us the money at the applicant/district level and allow us to buy equipment that will give each student at each school equitable access regardless

- of the size or age of building.
- 292. USAC needs to stop delivering one message and then changing rules and denying projects based on decisions that are counter to the information USAC specifically provided to applicants. The FCC and USAC need to stop viewing the USF money as belonging to vendors and service providers, it is money contributed by US citizens and should be used for the best solutions for those citizens' local schools and libraries, not used as a 'payback' system for service providers using community funds.
- 293. USAC should be accountable for the delays in funding decisions caused by THEIR administrative problems. It is not fair they experience no ill effects when they don't meet their deadlines yet, us applicants have to adhere to very strict deadlines or risk losing all of our funding.
- 294. VALUABLE TO SCHOOLS BUT THE CURRENT C2 BUDGET PER STUDENT IS VERY INADEQUATE AND SHOULD BE AT MINIMUM DOUBLED.
- 295. VoIP cost are hurting schools!
- 296. We appreciate the E-rate program and we do not take it for granted.
- 297. We are a fairly rural public library serving one of the largest counties in Oklahoma. As such, being able to offer Internet with the help of E-rate is THE KEY in our ability to provide services to thousands of customers who otherwise wouldn't have that.
- 298. We are a first-year applicant. I did reach out to the E-rate representatives for help with the process, but I was never informed of the 471 cut off time frame. I did not receive an email from E-rate or the representatives. When I asked about next steps in April, I was informed the window for filing was over. How can I adhere to something I don't know about and was not informed about...? I completed a wavier but as informed I can assume I will not receive the funding, never mind I have already worked through all the other steps required. I am very disappointed in this process.
- 299. We are a rural library whose patrons strongly depend on our Wi-Fi and Internet connection and we greatly appreciate the E-rate assistance.
- 300. We are a small rural school district

- and we would not be able to afford high speed Internet access nor the supporting infrastructures without E-rate funding.
- 301. We are a small school district in a small, rural community in Arkansas. We have a large population of impoverished families in our area. Our school is currently participating in the CEP program, since we have such a large population of families who qualify for the National School Lunch Program. Internet connectivity is a challenge for our community in many ways. Our only options at this point include CenturyLink, who provides DSL at a cost of an average of \$100 per month per household, satellite Internet providers whose services are even more expensive than DSL, and wireless hotspots purchased through wireless telephone providers (however only one provider, Verizon Wireless, has reliable service in the area). To add to that, CenturyLink has been telling new customers that they are unable to provide Internet connectivity to new customers at this time because they are already serving the maximum number of customers they can serve. So, new customers have to wait until another customer cancels their service to even get service. We have no cable provider in the area to provide any competition for the DSL or satellite Internet providers, so people are forced to pay the high prices, or have no connection at all. Unfortunately, there are many of our students' families who are in the category of having no service at all for the reasons listed above. If our community had the opportunity for more reasonably priced, or more readily available Internet access, our citizens would take advantage of this. I also feel like this would greatly benefit our students and school. Thank you for the opportunity to voice these concerns. I look forward to seeing what the E-rate program can do to help communities like ours in the future!
- 302. We are a state educational agency in a very rural state. Addressing the homework gap in our state is going to require rule changes from the FCC and USAC to allow access to school

- and library networks in the evenings.
- 303. We are a tiny library in a rural area and have ONE choice of provider. We get the very best CenturyLink offers but it is not enough to meet minimum library system expectations. Thank you so much for what you do to support all libraries but especially our small rural libraries that are vital to small towns!!!
- 304. We are wasting money because of the complexity of the process by having to hire a consultant to process it and to try to keep us out of audits due to the complex nature of the program. Schools only use the bandwidth during the day letting the community use it at night would help to level the growing homework gap of students without access to the resources.
- 305. We could not afford high speed Internet at our library without E-rate. To pay the entire cost would force us to make serious cuts to other library services. That is a devil's bargain. Which public do you choose to harm? 26,355 people used our Internet workstations last year. This year, 7,901 have used them and another 2,518 have used our wireless network. It is a vital service for our community. We couldn't do it without E-rate
- 306. We do not need the level of bureaucracy that has been created for this program. Give us an allocation for this and make it a grant program instead of all the hassles. Taking away funding for telephones when most of the money comes from telephone charges makes no sense at all. Also, funding based on free and reduced counts is unfair. Districts in those categories receive large amounts of extra funding already. How does Internet access have anything to do with the amount of poverty in a district?
- We get training, updates, and regulation and procedure information from our state E-rate coordinator.
- 308. We hate E-rate 2.0 and the funding formula. It was a huge hassle to cost allocate across all schools for district office equipment. We have been waiting 2 years to get a SPIN change approved because a contractor sold their business. The

- FCC can't seem to get their system to do it. So, we have basically lost all that money because they won't reimburse us without the SPIN change. And after calls, tickets, complaints, and every other attempt to get this resolved, they simply ignore the situation. But that won't stop Ajit Pai from killing net neutrality, so we end up with yet ANOTHER expense that won't be covered.
- 309. We have fiber for Internet which cannot be utilized without a phone line, yet you no longer reimburse for phone service. What sense does that make if your purpose is to provide improved Internet service to all communities? We have been applying for E-rate for over 18 years. We may discontinue applying because the process is not worth the return. Shame on you for taking money from phone service consumers but declining to reimburse us for phone service!
- 310. We have participated in the program every year from the very first year around 1989-1990. We would not be able to serve our community with Internet service without E-rate support.
- 311. We have yet to receive any significant E-rate funding.
- 312. We need continued Category 2 funding for infrastructure. We also need more funding for VoIP and Internet security. We need continued Cat 1 funding for Internet and for VoIP that would really help.
- 313. We need to simplify fiber builds to the local schools for self-provisioned networks.
- 314. We really need Voice funded again in our district. It has really crippled our local budget. The old procurement and application process for Wi-Fi worked for us and we already had good Wi-Fi in our schools. The E-rate modernization order hurt us more than it helped us by cutting funding to local phone service, cell service, and hosted VolP.
- 315. We still really could benefit from telephone reimbursement. It would be very helpful if that could be reinstated.
- 316. We strongly encourage and implore the FCC to continue funding Category 2 network expansion and upgrade

- projects for another five-year cycle beginning with fy2020.
- 317. We very much appreciate the funding as we could not do what we do without it, but the productivity portal is simply dreadful, awful, unusable, ridiculously opaque.
- 318. We would really appreciate more funding for our Category 1.
- 319. We, as a tax supported library and a small library district, rely on county taxes. We are disappointed that the program does not now help with telephone service costs.
- 320. While I have the form process down pat, the EPC system makes no sense. It's virtually impossible to find anything. The language used is not user friendly and confusing. I prefer the old system. I feel like I inadvertently keep creating "tasks". Why does it have to be so difficult to fill out an online form? I also don't like that the deadline to change entity info is so early and before the form. I'd like to get my paperwork in order and file in one sitting, rather than two that are months apart.
- 321. While I understand the desire to distribute the limited funding to other goods and services that have become increasingly common in schools, the Voice phase-down has significantly impacted us financially. That financial burden makes it difficult to invest in initiatives that bring newer technology to the district.
- 322. Why is this done automatically?

 Vendors should be able to offer this discount directly and be reimbursed directly. Schools and libraries should not be forced to deal with extra paperwork and consulting fees.
- 323. Without the E-rate program we would not be able to provide Internet access to all of our students for our 1-to-1 program. My hope is that the FCC will continue funding category 2 network expansion and upgrade projects for another five-year cycle beginning with FY2020 and beyond.
- 324. With the current state of cybersecurity today, tt is essential to put in place security and network protection systems to support the Internet access we provide to our students (e.g. NAC, next gen firewalls, content filter, DLP

- protection services). These systems not only protect the network but also protect our student's information online. Currently E-rate only provides a small percentage of funding or no funding for these products and services.
- 325. With the new eligibility list, we no longer benefit much from Cat 1. We can apply for only Internet services.
- 326. With the rise of applicants who use consultants to file their E-rate, USAC should make their training and EPC portal more consultant friendly. Districts rely on consultants to handle ALL of their E-rate processing needs. They don't want to manage their profiles as they aren't familiar with the website and don't want to be. Administrators move from district to district regularly and changing Account Admins is complex in the eyes of an administrator that is in a new position within the district. Districts just want to know the important things like when forms are due and how much funding did they receive. The rest is up to the people they hire to handle it.
- Would love to have coverage for Voice again. This is a significant cost to schools.
- 328. You should allow content filtering, gateway antivirus, intrusion protection, and advanced security feature sets on all network equipment.
- 329. You've made it too difficult for us to use this program. This is why schools have not participated. Instead of helping us get the funds, you deny, deny, deny. Stop fighting us and start helping us.

Funds For Learning

Funds For Learning, LLC (FFL), is an advocate for the use of educational technologies and student Internet access.

Formed in 1997, FFL is a professional services firm that focuses on E-rate funding management and compliance support. Each year, FFL's work directly supports millions of students and library patrons throughout America.

Professional Standard of Conduct

FFL has established and implemented several self-imposed professional consulting standards for our firm and its employees. Although no formal regulation exists governing E-rate consultants, FFL voluntarily complies with the following Code of Conduct, Code of Ethics, and Code of Client confidentiality.

CODE OF CONDUCT

FFL understands that conflicts of interest or the appearance of impropriety can negatively impact customer trust and/or E-rate application success. Therefore, FFL has a comprehensive Code of Conduct to which its staff complies.

Below are several key elements of this code:

FFL does not sell or offer any E-rate eligible services

FFL does not have a SPIN (Service Provider Identification Number)

FFL does not prepare technology plans

FFL does not advise clients on what technology to procure or from whom to purchase it.

FFL does not receive payment from service providers based on their sales to applicants.

FFL first developed a formal, internal code of conduct in 2002; and, in 2004, FFL became the first E-rate consultancy to publish a code of conduct and to submit itself to public accountability in this manner.

CODE OF ETHICS

FFL is a founding member of the E-rate Management Professionals Association (E-mpa®). This association has developed a comprehensive Code of Ethics for E-rate consulting firms. This Code of Ethics is based on similar codes established for Certified Public Accountants. As a member of E-mpa®. FFL agrees to comply with the E-mpa® Code of Ethics.

CODE OF CLIENT CONFIDENTIALITY

FFL places a high value on client confidentiality. FFL employees frequently receive confidential information from client customers. FFL does not share that information with other parties. Furthermore, as a condition for employment, each FFL staff member agrees to and signs a strict client confidentiality agreement.